

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO. 19-CVS-_____

NEIGHBORHOOD NETWORKS)
PUBLISHING, INC. and N2)
FRANCHISING, LLC,)
Plaintiffs)

v.)

JACQUELINE MARIE LYLES and)
LIFESTYLE PUBLICATIONS LLC,)
Defendants)

AFFIDAVIT OF
MARYANN CELARDO

MaryAnn Celardo, being first duly sworn, deposes and says:

1. I am over 18 years of age, and I suffer from no mental disability. I am competent to testify concerning the matters stated herein, and the statements contained in this Affidavit are based upon my personal knowledge, except as to those matters stated on information and belief, which I believe to be true.

2. I am a Contracts Legal Affairs Specialist for Plaintiff Neighborhood Networks Publishing, Inc. ("N2" or the "Company"). In that capacity and by virtue of my duties and responsibilities, I am familiar with the manner in which the N2's records are created and maintained, and have access to its computer and software systems.

3. N2's records show that one its former advertisers is Cunningham Associates Heating & Air located in or around Atlanta, GA.

4. Information that is stored in the Company's "N2 Portal", which is the cloud-based software system that the Company and its Area Directors use to, among other purposes, manage and process customer advertising contracts, orders, and invoices, shows that N2 published the advertisement for Cunningham Associates Heating & Air between March 2016 and February 2019 in N2's publication *Peachtree Battle Living*. Such information contained in the N2 Portal is

kept in the course of regularly conducted business activity and it is the regular practice of the business activity to record such information.

5. Attached here under Exhibit A are true and accurate copies of (i) the front cover of the October 2018 issue of *Peachtree Battle Living*, which is a publication owned by N2, (ii) the page listing Jackie Lyles as the N2 Area Director responsible for *Peachtree Battle Living* at that time, and (iii) the page that includes the advertisement for Cunningham Associates Heating & Air in that issue of *Peachtree Battle Living*.

6. Upon information and belief, N2 designed that advertisement for Cunningham Associates Heating & Air.

7. Attached here under Exhibit B are true and accurate copies of (i) the front cover of the May 2019 issue of *BuckHaven Lifestyle*, which is a publication owned or operated by N2's competitor, Defendant Lifestyle Publications, (ii) the page listing Jackie Lyles as the Account Executive for Lifestyle Publications, and (iii) the page that includes the advertisement for Cunningham Associates Heating & Air in that issue of *BuckHaven Lifestyle*.

8. N2's *Peachtree Battle Living* and Lifestyle Publications' *BuckHaven Lifestyle* are competing publications located in or around Atlanta, GA.

This the 2nd day of May, 2019.

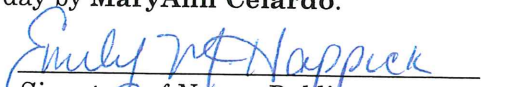


MaryAnn Celardo

NEW HANOVER COUNTY, NORTH CAROLINA

Sworn to (or affirmed) and subscribed before me this day by **MaryAnn Celardo**.

Date 5/2/2019


Signature of Notary Public
My commission expires: 12/14/2019

(Official Seal)



EXHIBIT A

PEACHTREE BATTLE *Living*

October 2018

A Social Publication Exclusively For The Residents Of Peachtree Battle

Say "Hello" To The Ingram Family

Photography By Nichole Schweickert Of Prain And Pea Photography

YOUR NEIGHBORHOOD • YOUR STORIES • YOUR PICTURES

Case 7:19-cv-00089-BO Document 51-8 Filed 06/25/20 Page 4 of 12

AREA DIRECTOR



Jackie Lyles
404-936-0499
jackie.lyles@n2pub.com

AD MANAGER

Katie Connelly
katie.connelly@n2pub.com

CREATIVE TEAM

N2 Publishing Design Team

CONTRIBUTORS AT LARGE

The residents of Peachtree Battle
We are always looking for residents to follow up
on leads, find great stories and send us ideas.
Let's celebrate the great things happening in our
community! No contribution is too small. Please email
me at jackie.lyles@n2pub.com with your pictures,
suggestions, or requests

IMPORTANT PHONE NUMBERS

EMERGENCY

911
Fire/Police/Ambulance
Poison Control Center
(800) 222-1222
Poison Toll Free Hotline

NON-EMERGENCY

(404) 658-6666
Atlanta Police Department
(404) 848-7231
Atlanta Police - Zone 2
(404) 242-3321
Peachtree Battle Security

ANIMAL CONTROL

(404) 613-0358
Fulton County Animal Services

CITY OF ATLANTA

(404) 330-6051
JP Matzigkeit - Councilmember District 8
(404) 330-6333 or 311
City of Atlanta 311 Customer Service Center
atl311.com

Highways & Streets

Solid Waste Services
Traffic & Transportation
Watershed Management

(404) 546-4813

Department of Parks (reports of trees down)

SCHOOLS

(404) 802-7050
E. Rivers Elementary
(404) 351-0012
The Suzuki School
(404) 802-5600
Sutton Middle School
(404) 802-4700
North Atlanta High

AROUND THE NEIGHBORHOOD

(404) 355-1009
Bobby Jones Golf Course
(404) 609-7193
Bitsy Grant Tennis Center

MISCELLANEOUS CONTACTS

(404) 224-0102
Fulton County Board of Assessors
(404) 730-7072
Fulton County Voter Registration
(888) 660-5890
Georgia Power Customer Service
(678) 413-8400
Georgia Dept. of Driver Services
www.dds.ga.gov

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The status quo, lapped again.

A near seven-decade disdain for the expected continues with the new Panamera. Redefined inside and out, it breathes new life into classic Porsche design cues. More powerful, more advanced, and more luxuriously appointed, the new Panamera is not just a new car, but a new benchmark. Porsche. There is no substitute.

The new Panamera 4S.

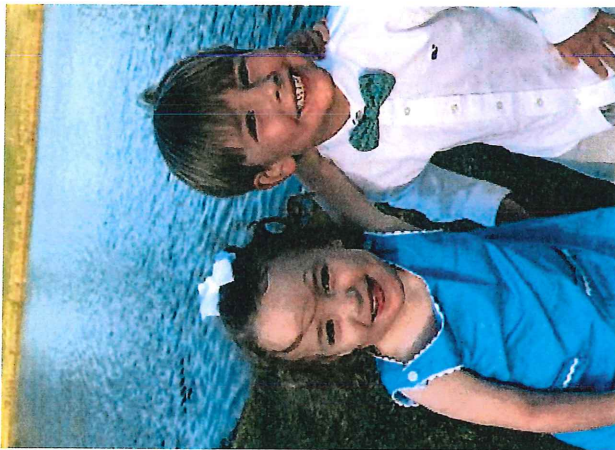
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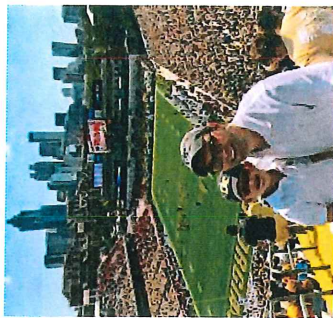
Photo by Kim Busby



2009 from Georgia Southern University. She is currently the media specialist at Morris Brandon Primary. Brandon graduated from Georgia Tech's College of Architecture in 2003. In 2012, he formed C. Brandon Ingram Design, an award-winning firm specializing in the design and renovation of classic and traditional houses across Southeast.

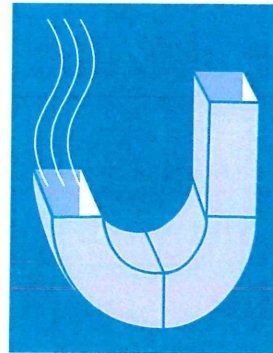
Charlie is now a six-year-old kindergartener at Morris Brandon and plays baseball and soccer. Mary Patrick and Elizabeth are three and are in preschool at Peachtree Road United Methodist, where the Ingrams also attend church. They, of course, love all things pink, purple, and *Frozen*! And all three have picked up their dad's appreciation for art, drawing, and Elvis and their mom's love of reading!

The Ingrams love a reason to celebrate! Birthdays are always a big deal at their house as are Easter and Christmas. They have continued their traditional Christmas Eve gathering with neighbors, friends, and family. As a family, they all enjoy Georgia Tech sports, Braves games, and vacations to their favorite beach destination, Amelia Island, where Katie grew up going, as well. When they are not enjoying time on their back patio, they like to spend time at Memorial Park, and the kids love Friday night dinners at Whitehall Tavern and ice cream at Baskin Robbins!



"One of our favorite things about living in our neighborhood is the people we have met," Katie says. "We have gotten to know so many wonderful young families like ours and look forward to meeting even more!" And Brandon adds, "This is absolutely a place that we feel comfortable. The location and the people in our neighborhood make it somewhere we look forward to calling our home for many years to come."

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New Customers Only
Not Valid with any other offers

*"Excellent service
from a great neighbor"*
Leah Wilkerson

EXHIBIT B



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Lifestyle Publications

Published on Apr 16, 2019

BuckHaven, GA May 2019

May 2019 Issue of BuckHaven Lifestyle

Similar to

Advertisement



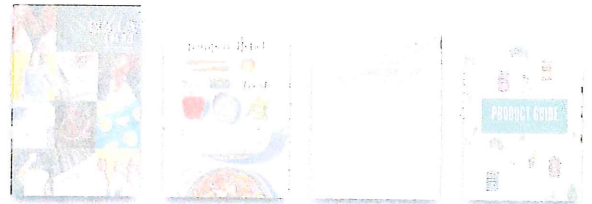
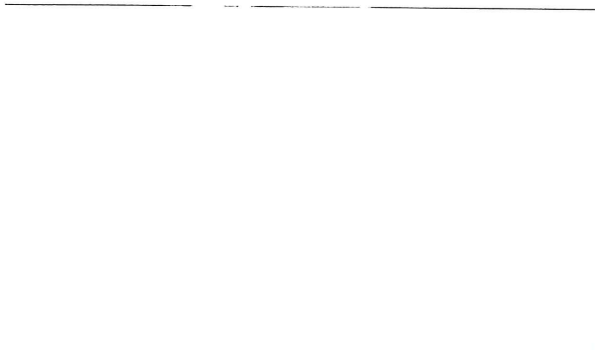
5/2/2019

BuckHaven, GA May 2019 by Lifestyle Publications - issuu

Source	Lehigh Valley	Canton	Seaside
Weekly April 18, 2019	Marketplace 2019 May	Family Life 5-19	Magazine April 2019
by thesource...	by lehighvalle...	by familylifep...	Issue
			by seasideti...

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GA May 2019
by [lifestylepubs](#)

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May 2019
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Johns Creek,
GA February
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Perimeter
North, GA
May 2019
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GO EXPLORE

Company Creator Hub

Resources Plans &
Products

Apps



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Apple iOS

Hello BuckHaven.

ON LIPSTICK, CLEAR PLASTIC RAIN HAT,
A FEW CLEAN TISSUES IN HER PURSE AT
days when she made dinner, still dressed for
highlight Sunday school. She served on the local
one: she took your notes and had a stunning smile.
and writing poetry, moving through her days as
the thoughtfulness and intentional efficiency
six years of marriage, they both found new
with relief and freedom. Mom continued to
with grace, though I don't think she wore aprons
her growing up, admired her when I became
a mother and miss her now that she's gone.
My favorites are those moments when, com-
ing. Yup, that was the best. Cursing has come a
my and back then, was kinder and more gentle.
for a heck, the project came to a screeching halt.
But she could project, launching a dangit across
one of a hydrogen bomb. It didn't happen that
very own June Cleaver would morph into a real
who was confident enough to curse. Now, don't
I am I first heard her whisper a "go to heck" and
time, I could be wrong, but that's my prerogative.
ins (p. 22, 27). I have been known to ask, WTF?
inspired restaurant menu prices and pollen.
this issue, we honor women. In all their glory.

Happy Mother's Day

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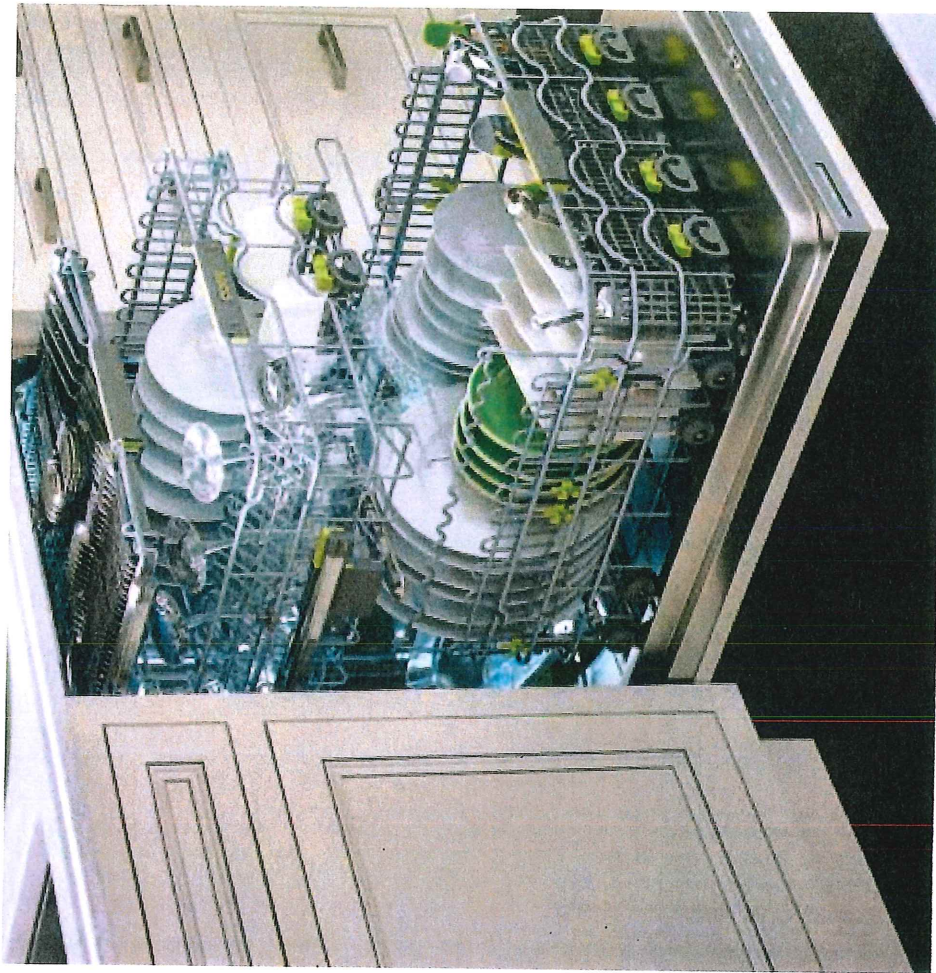


Lifestyle Publications

Published on Apr 16, 2019

BuckHaven, GA May 2019

May 2019 Issue of BuckHaven Lifestyle



Our audiences are encouraged to adapt to the distance we often meet with masks.

MARKET AREA ADMINISTRATOR
Dorice Richardson | Dorice.Richardson@lifestylespubs.com

SENIOR ACCOUNT MANAGER
Karyn Slavin | karynslavin@lifestylepubs.com

ACCOUNT EXECUTIVE
Jackie Lyles | jackie.lyles@lifestylepubs.com

CONTRIBUTING WRITERS
Dennis Malcolm Byton, Meg Daws

CONTRIBUTING PHOTOGRAPHERS
Glenn Brown, Raphael Miller

CORPORATE TEAM

CHIEF EXECUTIVE OFFICER Steven Schwengardt
CHIEF SALES OFFICER Matthew Perry

CHIEF FINANCIAL OFFICER DODD AND STRONG

ART DIRECTOR Sam Miner

OPERATIONS DIRECTOR LANCE THOMPSON

EDITORIAL MANAGER Nicolette Martin

AD MANAGER Chad Janson

REGIONAL SALES DIRECTOR Fmc Williams

WEB APPLICATIONS Michael O'Connell





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GOOD TIMES

**Buckhaven Salute Songster**

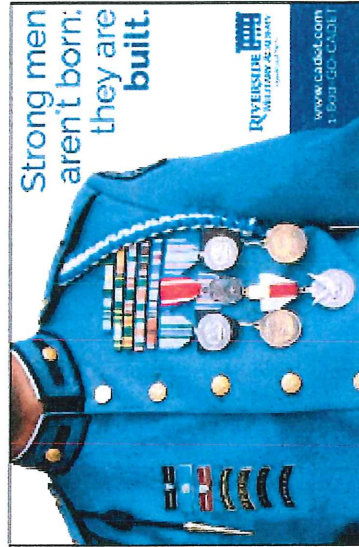
Thirteen and sixteen Buck Haven songsters performed at the Salute Songster event, which was a beautiful event celebrating the songsters and their families and friends. The event was held at the home of Mike and Mary Jo Wooten. BuckHaven.com

**Carter's Premier Dream Team Event**

Carter's hosted the Premier Dream Team event, an exclusive group of parents, coaches and supporters of premier athletes at the Buck Haven High School. The event was held at the school and featured a variety of activities and a delicious meal. BuckHaven.com



1. The Buck Haven High School event, 2. The Buck Haven High School event, 3. The Buck Haven High School event, 4. The Buck Haven High School event. BuckHaven.com



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Lifestyle Publications

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BuckHaven, GA May 2019

May 2019 Issue of BuckHaven Lifestyle

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by [thesourceweekly](#)



Lehigh Valley
Marketplace 2019
May
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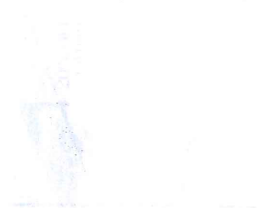
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Lookbook (US)
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